

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

In Re:	Case Number 07-13967-JNF
Robin Hayes	Chapter 13

**MOTION TO CONTINUE HEARINGS REGARDING MOTION TO DISMISS
(DOCKET #340) AND ORDER TO SHOW CAUSE (DOCKET #355)**

Now comes Deutsche Bank National Trust Company, as Trustee of Argent Securities, Inc. Asset-Backed Pass Through Certificates Series 2004-W11, under the Pooling and Servicing Agreement dated as of October 1, 2004 (“Deutsche Bank”) acting by and through its loan servicer, Citi Residential Lending, Inc. (“Citi”), and its counsel Korde & Associates, and respectfully request that the hearings currently scheduled for Thursday, December 11, 2008 be continued to a date convenient to the Court on or after December 15, 2008. In support of this motion, the parties state the following:

1. There are multiple matters in this case currently scheduled to be heard on December 11, 2008.
2. Those matters scheduled for hearing include Deutsche Bank’s Motion to Dismiss (Docket #340) and Order to Show Cause why Deutsche Bank and its Counsel should not be sanctioned under Fed. R. Bankr. P. 9011 (Docket #355).
3. Deutsche Bank acting by and through its loan servicer Citi filed a response to the Court’s Order to Show Cause. In addition, Korde & Associates, as counsel for Deutsche Bank and Citi during this case, also filed a response to the Court’s Order to Show Cause. These matters are all scheduled to be heard by the Court on December 11, 2008.
4. Attorney Sanjit S. Korde, owner of Korde & Associates, is getting married on December 6, 2008 in Costa Rica. Mr. Korde will be out of the country from December 1, 2008 through December 14, 2008 for his wedding and honeymoon.
5. Given the response to the Order to Show Cause filed by Korde & Associates and Mr. Korde’s position in the firm, Mr. Korde believes his presence at the hearing is necessary.
6. In the interest of judicial economy, Deutsche Bank believes that all other relevant matters currently scheduled for hearing on December 11, 2008 should also be continued to the same date.
7. Co-Counsel for Deutsche Bank assents to the filing of this motion.
8. Mr. Korde will be available for a date convenient to the Court on or after December 15, 2008.
9. Counsel for the parties respectfully request that the hearing not be rescheduled for the week between December 24, 2008 and December 31, 2008 due to the holidays and scheduled travel plans.
10. There is no prejudice to any party if the Court allows this motion to continue.

Wherefore, Deutsche Bank, its loan servicer Citi, and Korde & Associates respectfully request that the hearings currently scheduled for December 11, 2008 on the Motion to Dismiss (#340) and Order to Show Cause (#355) be continued to a date convenient to the Court on or after December 15, 2008. Counsel for the parties respectfully request that the hearing not be rescheduled for a date between December 24, 2008 and December 31, 2008

Dated: November 3, 2008

Respectfully submitted:

Deutsche Bank National Trust Company, as
Trustee of Argent Securities, Inc. Asset-Backed
Pass Through Certificates Series 2004-W11,
under the Pooling and Servicing Agreement
dated as of October 1, 2004, its loan servicer
Citi Residential Lending, Inc. and Korde &
Associates,
By their Attorney,

/s/ Julie A. Ranieri
Julie A. Ranieri (BBO#: 655936)
Korde & Associates, P.C.
321 Billerica Road, Suite 210
Chelmsford, MA 01824
978-256-1500

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CERTIFICATE OF SERVICE

I, Julie A. Ranieri, Attorney for **Deutsche Bank National Trust Company, as Trustee of Argent Mortgage Securities, Inc. Asset-Backed Pass Through Certificates Series 2004-W11, under the Pooling and Servicing Agreement dated as of October 1, 2004, Without Recourse** hereby certify that on November 3, 2008 I electronically filed the foregoing *Motion to Continue* with the United States Bankruptcy Court for the District of Massachusetts using the CM/ECF System. I served the forgoing documents on the following CM/ECF participants:

John Fitzgerald, US Trustee
Carolyn Bankowski, Trustee
David Baker, Esq.
Michael Van Dam, Esq.
Stephanie Kahn, Esq.
Nina Ching, Esq.
Nathanial J. Dorfman, Esq.
Stephen G. Murphy, Esq.

I certify that I have mailed by first class mail, postage prepaid the documents electronically filed with the Court on the following non-CM/ECF participants:

Robin Hayes
359 William Kelley Road
Stoughton, MA 02072

Robin Hayes
232 Perkins Avenue
Brockton, MA 02301

Tina Hayes
232 Perkins Avenue
Brockton, MA 02301

City of Brockton
Tax Collector
45 School Street
Brockton, MA 02401

/s/ Julie A. Ranieri
Julie A. Ranieri, Esquire
Korde & Associates
321 Billerica Road, Suite 210
Chelmsford, MA. 01824
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